

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**UNITED STATES SECURITIES  
AND EXCHANGE COMMISSION,**

**Plaintiff,**

**v.**

**Civil Action No. 1:24-cv-03583-VMC**

**DRIVE PLANNING, LLC, and  
RUSSELL TODD BURKHALTER,**

**Defendants,**

**and**

**JACQUELINE BURKHALTER,  
THE BURKHALTER RANCH  
CORPORATION, DRIVE  
PROPERTIES, LLC, DRIVE  
GULFPORT PROPERTIES LLC,  
and TBR SUPPLY HOUSE, INC.,**

**Relief Defendants.**

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**CERTIFICATE OF SERVICE OF RECEIVER'S MOTION FOR  
TURNOVER OF AND IMPOSITION OF CONSTRUCTIVE TRUST  
ON REAL PROPERTY IN INDIANA TRACEABLE TO  
DRIVE PLANNING, LLC AND REQUEST FOR EXPEDITED RELIEF**

I hereby certify that on June 18, 2025, I served a copy of the *Receiver's Motion for Turnover of and Imposition of Constructive Trust on Real Property in Indiana Traceable to Drive Planning, LLC and Request for Expedited Relief* (ECF

No. 131) via process-server on Gerardo Lorenzo Linarducci. *See* Affidavit of Service, attached hereto as **Exhibit A**.

Respectfully Submitted,

s/Russell Landy  
Russell Landy, Esq.  
Florida Bar No. 44417  
*Admitted Pro Hac Vice*

*Lead Counsel for Kenneth D. Murena,  
as Court-Appointed Receiver*

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